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Attorneys for Proposed Lead Plaintiff

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS**

PIERRE BRAZEAU, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

CASSAVA SCIENCES, INC., REMI
BARBIER, ERIC J. SCHOEN, JAMES W.
KUPIEC, NADAV FRIEDMANN and
MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00751-RP

WANDA NEWELL, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

vs.

CASSAVA SCIENCES, INC., REMI
BARBIER, and ERIC J. SCHOEN,

Defendants.

Case No. 1:21-cv-00760-RP

KATLYN K. REIN, Individually and on
Behalf of All Others Similarly Situated,

Plaintiffs,

vs.

CASSAVA SCIENCES, INC., REMI
BARBIER, ERIC J. SCHOEN, JAMES W.
KUPIEC, NADAV FRIEDMANN and
MICHAEL MARSMAN,

Defendants.

Case No. 1:21-cv-00856

**MOTION OF THE CASSAVA SECURITIES GROUP FOR CONSOLIDATION,
APPOINTMENT AS LEAD PLAINTIFF, AND APPROVAL OF SELECTION OF LEAD
COUNSEL**

Proposed Lead Plaintiff, Warren Choi, Kevin Otto, and Ken Van Ho, investors in Cassava securities including common stock and options, (collectively the “Cassava Securities Group” or “Movant”), hereby moves this Court, pursuant to Rule 42(a) of the Federal Rules of Civil Procedure, for entry of an order consolidating the above-captioned related securities class actions (the “Actions”).

Movant respectfully requests, pursuant to the Private Securities Litigation Reform Act of 1995 (the “PSLRA”), that the Court appoint it as the Lead Plaintiff in the Actions and approve its

selection of Berger Montague PC as lead counsel and Burns Charest LLP as Local Counsel. The Court should appoint Movant as Lead Plaintiff because it has demonstrated the “largest financial interest in the litigation,” and because it otherwise meets the typicality and adequacy prongs of Fed. R. Civ. P. 23. See 15 U.S.C. 78u-4(a)(3)(B). As demonstrated in its supporting Memorandum of Law, filed herewith, Movant has sustained losses of \$435,416 in its investment in the securities of Cassava Sciences, Inc. during the period of September 14, 2020 through and including August 27, 2021 (the “Class Period”). Berger Montague PC has extensive experience successfully litigating securities class actions and possesses the resources necessary to vigorously pursue this litigation on behalf of the putative class.

WHEREFORE, for the reasons set forth above and in the accompanying Memorandum of Law supported by the Declaration of Warren T. Burns and the exhibits attached thereto, Movant respectfully requests that the Court enter an Order consolidating the Actions, appointing Movant as Lead Plaintiff, and approving Berger Montague PC as Lead Counsel and Burns Charest LLP as Local Counsel.

CERTIFICATE OF CONFERENCE

Local Rule CV-7(i) requires a conference of counsel prior to filing motions. Due to the PSLRA’s lead plaintiff procedure, however, Movant does not yet know which other entities or persons plan to move for appointment as lead plaintiff until after all the movants have filed their respective motions. Under these circumstances, Movant respectfully requests that the conferral requirement of Local Rule CV-7(i) be waived.

Dated: October 26, 2021

Respectfully submitted,

/s/ Warren T. Burns

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***Attorneys for Lead Plaintiff Movant and Proposed
Lead Counsel for the Class***

CERTIFICATE OF SERVICE

I hereby certify that on October 26, 2021, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

/s/ Warren T. Burns
Warren T. Burns